

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

TITAN INDEMNITY COMPANY :

Plaintiff :

v. : Civil Action No.:8:15-CV-02480-

GAITAN ENTERPRISES, INC., ET AL :

DEFENDANTS BEATRICE COOK, INDIVIDUALLY AND AS PERSONAL  
REPRESENTATIVE OF THE ESTATE OF LEROY COOK, RAYMOND  
JOHNSON, JR., DEBORAH QUATERMAN, LORETTA PHELPS, VICTOR  
COOK, DAPHNE COOK, DAWN COOK, AND LASHAWN COOK  
DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iii)

Defendants seek non-monetary relief as follows:


(1) That the Court find that there is coverage under the Titan Policy for any liability arising out the Cook suit and/or the occurrence of June 19, 2012; and

(2) That Titan has a duty to defend Gaitan Enterprises, Inc. or Marvin Gaitan in the Cook suit; and

(3) Titan does have duties and obligations under the MCS-90 endorsement with respect to claims and suits arising out of the Cook suit; and

(4) Such other relief to which Defendants may be justly entitled.

THE JAKLITSCH LAW GROUP

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13<sup>th</sup> day of October, 2015 a copy of the foregoing Disclosure was e-served and mailed, postage prepaid, via first-class mail, to David B. Stratton, Esquire, 10509 Judicial Drive, Suite 200 Fairfax, Virginia 22030.

  
Deborah L. Potter